

REMARKS

This Amendment is responsive to the Office Action mailed April 15, 2008.

In the Office Action, claims 1-17, 25-26, 34, and 37-38, were rejected under 35 U.S.C. §103(a) as being unpatentable over Safadi et al. (US2005/0289617) (hereinafter “Safadi”) in view of Callway (US6,950,772). Reconsideration and withdrawal of these rejections is respectfully requested for the reasons stated below.

Claim 1, as amended, recites:

an input, the input being configured to accept a plurality of input streams from a corresponding plurality of input connections;

an input multiplexer coupled to the input, the input multiplexer not including a tuner;

an output, the output being configured to selectively output a plurality of output streams;

an output multiplexer coupled to the output, the output multiplexer not including a tuner;

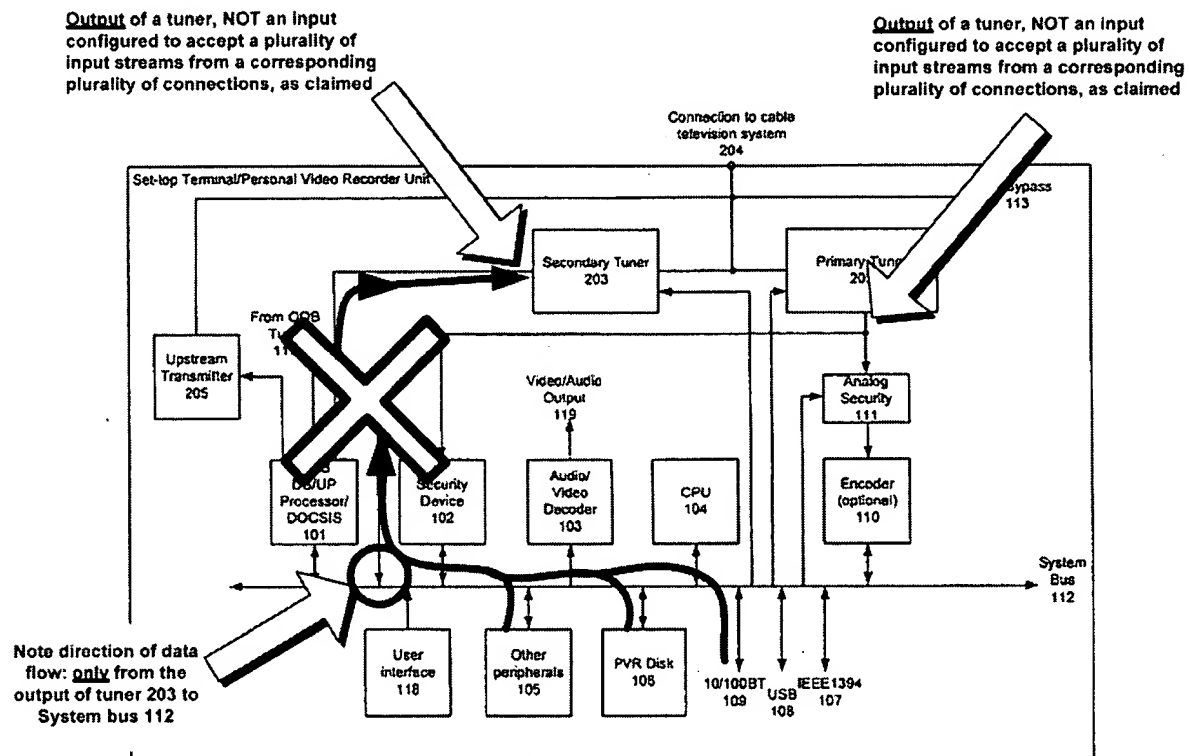
a first digital bus coupled between the input and output multiplexers, the first digital bus being uninterrupted between the input and the output multiplexers such that a digital signal presented at the input multiplexer is carried unchanged over the first digital bus to the output multiplexer;

an analog bus connected between the input and the output multiplexers, the analog bus being separate from the first digital bus and including a video signal decoder coupled to the input multiplexer and a video signal encoder coupled to the output multiplexer, and

a graphics processing assembly coupled to the first digital bus and to the analog bus.

The Office’s primary reference to Safadi et al. teaches a PVR, shown in Fig. 1. The Office identifies the “outputs of 202 and 203, 105-109” as being the claimed input. At the outset, the Office cannot call an output of a tuner an input, and much less “an input, the input being configured to accept a plurality of input streams from a corresponding plurality of input connections”, as claimed herein. The output of the tuner 203 is just that, an output of a tuner, not an input that is configured to accept a plurality of input streams. The same goes for the

output of the tuner 202. It is not an input that is configured to accept a plurality of input streams. The Office cannot, merely by saying so, transform an output into an input, disregarding both the common meaning of the word and the circuit diagram of the applied reference itself.



Moreover, as shown above, the data flows away from the output of the secondary tuner 203 to the system bus 112, not the other way around – so it cannot be an input. See lower arrow in the diagram above. Recall that claim 1 recites:

an input, the input being configured to accept a plurality of input streams from a corresponding plurality of input connections;

The Office appears to make the argument that the claimed “plurality of input connections” corresponds to “105 – 109”. However, the connection from the output of the secondary tuner 203

to the system bus 112 cannot be the claimed input, as the secondary tuner 203 is not and cannot be “configured to accept a plurality of input streams” from 105-109, as the direction of data flow is only from the output of the secondary tuner 203 to the devices 105-109. The output of the secondary tuner 203 cannot accept input streams. The secondary tuner 203 is designed, in Safadi, to feed the system bus 112 and the devices coupled thereto, not the other way around.

The claim continues:

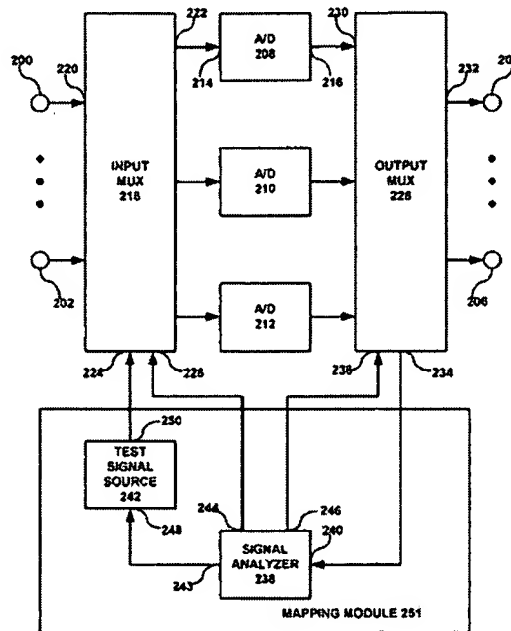
a first digital bus coupled between the input and output multiplexers, the first digital bus being uninterrupted between the input and the output multiplexers such that a digital signal presented at the input multiplexer is carried unchanged over the first digital bus to the output multiplexer;

The Office states that Safadi teaches a first digital bus between the output of secondary tuner 203 and System bus 112. The Office also points to the secondary reference to Callway as teaching input and output multiplexers. While Callway does indeed teach input and output multiplexers, the applied combination fails to teach or to suggest the claimed embodiments.

At the outset, Safadi et al. does not teach what the Office asserts that it does. Indeed, Safadi teaches a digital bus that is configured between an OUTPUT of a tuner and a system bus. Therefore, whether The multiplexers of Callway are added to Safadi’s circuit or not, the combination would fail to meet the *metes and bounds* of the claim. The output of a tuner is not an input, even for the purposes of reinterpreting a reference to meet the limitations of a claim for the purposes of an obviousness rejection.

Let’s look at Callways’ system. Callway shows, in Fig. 1, an input multiplexer 218, an output multiplexer 228, and Analog to Digital converters 208, 210 and 212 therebetween. Callway does not show any

a first digital bus coupled between the input and output multiplexers, the first digital bus being uninterrupted between the input and the output multiplexers such that a digital signal presented at the input multiplexer is carried unchanged over the first digital bus to the output multiplexer;



To the contrary, Callway specifically shows that signals presented at the input multiplexer 218 are analog-to-digital converted before being presented at the output multiplexer 228. Specifically, the signals presented at the input multiplexer are NOT carried uninterrupted to the output multiplexer 228, as required by the claims. Therefore, the secondary reference, presented as teaching that which the primary reference lacks, itself does not teach or suggest the claimed subject matter, whether considered singly or in combination with the primary reference to Safadi.

The combination of Safadi and Callway does not teach or suggest the claimed embodiments. Indeed, the bus coupling the output of the secondary tuner 203 to the devices 105-108 cannot be the claimed input, as it cannot accept any signals – it's an output. Moreover, even adding

Callway's input and output multiplexers to Safadi's circuit would not teach or suggest the claimed embodiments to a skilled artisan, as Callway does not teach any first digital bus that is configured such that a signal presented at the input multiplexer is carried unchanged to the output multiplexer. To the contrary, Callway teaches away from that limitation, as Callway specifically teaches that signals presented at the input multiplexer 218 are more assuredly not carried unchanged to the output multiplexer, they are A/D converted. The applied combination, therefore, would teach a skilled artisan to add an input multiplexer to the output of Safadi's secondary tuner 203 (for what purpose, it is not known) and an output multiplexer to the system bus 112 (again, for what purpose?), and A/D convert the signals therebetween (again, for some unspecified reason).

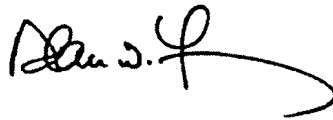
The Office has not met its duty of presenting a *prima facie* case of obviousness, as the applied combination does not and cannot teach the claim limitations. The Office must do more than just find another reference with the two circuit elements (multiplexers) that are not present in the primary reference and state that "it would have been obvious to one of ordinary skill in the art to modify Safadi's system to physically include input and output multiplexers" without specifying how such input and output multiplexers could be coupled to Safadi's circuit to meet the claim limitations, without breaking the functionality of the primary reference, as would happen if Callway's mux-A/D-mux were to be coupled between the output of the secondary tuner 203 and the system bus 112.

Indeed, the Office has not stated how (and for what purpose) Callway's input multiplexer could be coupled to the structure identified in the outstanding Office Action as the claimed input (the output of the secondary tuner 203). It is respectfully submitted that no multiplexer is needed to "isolate" the secondary tuner 203 from the system bus 112, and the Office has not indicated how that would be done.

In any event, as the primary reference does not teach or suggest that which is attributed to it in the outstanding Office Action and as Callway teaches away from the claimed embodiment by teaching that their multiplexers 218, 228 are interconnected by A/D converters, the applied combination cannot be said to teach or to suggest the claimed embodiments. Reconsideration and withdrawal of the 35 USC §103(a) rejections are, therefore, respectfully requested

Applicants believe that this application is now in condition for allowance. If any unresolved issues remain, please contact the undersigned attorney of record at the telephone number indicated below and whatever is necessary to resolve such issues will be done at once.

Respectfully submitted,



Date: October 14, 2008

By: _____

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